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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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AZ CORP COMMISSION
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IN THE MATTER OF THE STAFF REPORT ON)
INTERCONNECTION FOR THE GENERIC)
INVESTIGATION OF DISTRIBUTED)
GENERATION.)

DOCKET NO. E-00000A-99-0431

**JOINT COMMENTS OF TUCSON
ELECTRIC POWER COMPANY
AND UNS ELECTRIC, INC.**

Tucson Electric Power Company and UNS Electric, Inc. (collectively, "UniSource Energy") respectfully submit these comments in response to the Arizona Corporation Commission's ("Commission") Staff Report on Interconnection for the Generic Investigation of Distribution Generation filed January 24, 2007 ("Staff Report"). UniSource Energy appreciates the opportunity to comment on this important issue.

UniSource Energy found the collaborative workshop process to be very rewarding and appreciates Staff's analysis in resolving areas where agreement could not be reached. While UniSource Energy recognizes that interconnection standards are a work in progress, we believe the Staff Report is an excellent first step. UniSource Energy therefore has only one comment on the Staff Report.

In Section 5, the Staff Report contains the following language concerning annual reporting:

The annual report shall include, for the reporting period, a summary of the number of complete Applications received, the number of complete Applications approved, the number of complete Applications denied by level, and the reasons for denial.

While UniSource Energy agrees that annual reporting can be a valuable tool, it is concerned that the above language will result in a large volume of data of reasons for denial, much

1 of which is not useful in the Staff's stated purpose of monitoring how well the interconnection
2 process is working. Systems of 10 kW and below of interconnected capacity will generally fall
3 into the Level 1 screen criteria. As this screen is simple and straightforward, there is little to be
4 gained in reporting specific reasons for denial of these systems. Systems larger than 10 kW of
5 interconnected capacity will be evaluated using Level 2 and Level 3 screens and will be required
6 to meet more restrictive standards. Reporting the reasons for denial of these applications is
7 valuable in evaluating the appropriateness of the Level 2 and Level 3 screen criteria. UniSource
8 Energy therefore recommends that the annual reporting of reasons for denial be limited to systems
9 above 10 kW.

10 To that end, UniSource Energy suggests the following language:

11 The annual report shall include, for the reporting period, a summary of the
12 number of complete Applications received, the number of complete
13 Applications approved, the number of complete Applications denied, and
for systems above 10kW, the reasons for denial.

14 In addition to this language recommendation, UniSource Energy suggests that the
15 upcoming rulemaking on interconnection standards include a provision for utility-requested
16 waivers of specific details of the interconnection standards to allow for changing generation
17 technologies and the aggregate impacts of interconnected distributed generation, which are
18 generally not addressed by this interconnection standard.

19 Again, UniSource Energy appreciates the opportunity to comment on this important issue
20 and would be happy to answer any questions regarding the content of this filing. We look forward
21 to participating in the rulemaking process.
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1 RESPECTFULLY SUBMITTED this 21st day of February, 2007.

2 TUCSON ELECTRIC POWER COMPANY
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16 Original and thirteen copies of the foregoing
17 filed this 21st day of February, 2007, with:

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